

ATTACHMENT A**Voluntary Product Stewardship Programs**

- o On May 4, 1993, the Carborundum Company, Premier Refractories and Chemicals, Inc., and Thermal Ceramics, Inc., the principle manufacturers of refractory ceramic fibers (RCF), signed a TSCA §4 Enforceable Consent Agreement (ECA) to conduct workplace exposure monitoring studies on RCF.
- o In conjunction with the TSCA §4 ECA as well as a proposed TSCA §5(a)(2) Significant New Use Rule (SNUR), the Refractory Ceramic Fibers Coalition (RCFC), representing the 3 RCF producers, developed a Product Stewardship Program (PSP) designed to evaluate, control and reduce workplace exposure to RCF.
- o The PSP involves the “cradle-to-grave” lifecycle of RCF and includes development/implementation of the following major activities:
 - o additional exposure monitoring studies
 - o workplace control evaluation (e.g., engineering controls, handling practices);
 - o exposure assessments;
 - o health effects research (including animal inhalation studies as well as epidemiological studies);
 - o product research and development;
 - o special studies (e.g., waste generation rates, potential for waste reduction, exposure potential for consumer applications of RCF); and
 - o communications programs (customers, users, workers, Federal Agencies, etc.).
- o The PSP currently being employed by the RCFC companies is also being adopted by some of the RCFC customers. OPPT has been encouraged by RCFC's commitment to product stewardship and believes that it is a significant step toward risk reduction for RCF, a fiber shown to be carcinogenic in animal studies.